

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

IN RE SONUS NETWORKS, INC. LITIGATION) Civil Action No. 04-10294-DPW) (Lead Case)))
_____) LEAD PLAINTIFF'S UNOPPOSED) APPLICATION FOR LEAVE TO FILE A) SINGLE OVERSIZED MEMORANDUM) OF LAW IN OPPOSITION TO) DEFENDANTS' MOTIONS TO DISMISS) AND FOR APPROVAL OF AGREED) MODIFICATION OF BRIEFING) <u>SCHEDULE BY ONE DAY</u>)
THIS DOCUMENT RELATES TO: ALL CASES	

Pursuant to the Court's June 1, 2005 Order, Lead Plaintiff's opposition to defendants' motions to dismiss Lead Plaintiff's First Amended Consolidated Class Action Complaint (the "Complaint") is to be filed October 10, 2005. Defendants Sonus Networks, Inc., Hassan M. Ahmed, and Stephen J. Nill each filed a separate motion to dismiss the Complaint, encompassing a total of fifty-two (52) pages of briefing, as well as voluminous supporting materials.

While Lead Plaintiff could, pursuant to LR 7.1(b), file separate memoranda in opposition to these motions not to exceed twenty (20) pages each, Lead Plaintiff believes that a single memorandum of law opposing the motions would be of benefit to the Court and parties, as there is overlap among the legal issues raised in the motions to dismiss.

Accordingly, pursuant to LR 7.1(b)(4), Lead Plaintiff hereby requests leave of Court to

file a single memorandum of law in opposition to defendants' motions to dismiss, not to exceed fifty-five (55) pages. Defendants have advised Lead Plaintiff's counsel that they do not oppose this request.

The Court's June 1, 2005 Order requires Lead Plaintiff's opposition to the motions to dismiss to be filed on October 10, 2005. While that day is a federal holiday, Lead Plaintiff believes that the electronic filing system may allow for submission of the opposition on that day. Nonetheless, Lead Plaintiff requests a one (1) day extension, to October 11, 2005, to file its opposition to the motions to dismiss. Lead Plaintiff has consulted with defendants' counsel and proposed this extension, as well as a one day extension for defendants to submit their reply memoranda, to October 24, 2005. Defendants are in agreement with this proposal. The Court has scheduled oral argument on the motions for December 7, 2005.

Dated: September 30, 2005

GOLD BENNETT CERA & SIDENER LLP

By /s/ Solomon B. Cera

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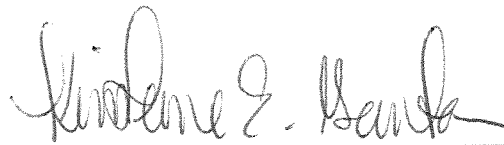
CERTIFICATE OF SERVICE

I, KimLane E. Gantan, hereby declare under penalty of perjury as follows:

I am employed by Gold Bennett Cera & Sidener LLP, 595 Market Street, Suite 2300, San Francisco, California, 94105-2835. I am over the age of eighteen years and am not a party to this action.

On September 30, 2005, a true and correct copy of the aforementioned **“LEAD PLAINTIFF’S UNOPPOSED APPLICATION FOR LEAVE TO FILE A SINGLE OVERSIZED MEMORANDUM OF LAW IN OPPOSITION TO DEFENDANTS’ MOTIONS TO DISMISS AND FOR APPROVAL OF AGREED MODIFICATION OF BRIEFING SCHEDULE BY ONE DAY”** was delivered to all counsel of record by electronic service pursuant to the Court’s Order Regarding Electronic Service and served to counsel not on the Court’s electronic service by causing true and correct copies of same to be enclosed in sealed envelopes and deposited in the U.S. Mail, postage prepaid, or delivered as otherwise indicated on the attached Exhibit I.

Executed on September 30, 2005, at San Francisco, California.

A handwritten signature in black ink, appearing to read "KimLane E. Gantan", written over a horizontal line.

KimLane E. Gantan

EXHIBIT I

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